

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA * CRIMINAL DOCKET NO. 09-158 “R”

V. * SECTION:

SHANQUELL WILSON * **VIOLATION: 18 U.S.C. § 2113(b)**

✻

* * *

FACTUAL BASIS

If this case were to proceed to trial, the government would prove the defendant's guilt beyond a reasonable doubt through the introduction of admissible evidence and the testimony of competent witnesses. The government would also show that at all times mentioned in the bill of information, the defendant, **SHANQUELL WILSON**, was a resident of the Eastern District of Louisiana, residing in New Orleans, Louisiana and that the acts described below also occurred in the Eastern District of Louisiana. Specifically, the Government would prove the following:

SHANQUELL WILSON was employed as the head teller at the Veterans Boulevard branch of the Bank of New Orleans from June 2007 until she was terminated on November 17, 2008. Witnesses would be called and evidence would be submitted that her duties included supervising bank tellers, organizing schedules, ensuring adherence to bank policies and procedures,

as well as occasionally conducting customer transactions. Employees would testify that when a customer came into the bank to withdraw money from a teller, a withdrawal slip was required to be filled out, in order for the person to take custody of the funds. The teller that performed the transaction would enter the information into his or her terminal, and the transaction would also be logged onto daily sheets.

Witnesses would testify that a bank customer entered the bank on November 17, 2008 to inquire about certain withdrawals. The customer did not recall making the withdrawals. An internal audit was started to determine if all of the particular withdrawals were unauthorized, how many withdrawals were made and how much money was withdrawn. A bank official would also testify that a search of bank records indicated that **WILSON** performed the first questioned withdrawal. It was determined that other withdrawals were performed by **WILSON** as well as some by another teller. **WILSON** was asked to provide withdrawal slips relating to the transactions. She was unable to provide the proper slips. After being confronted with records and statements that she had previously made to the victim, **WILSON** admitted to withdrawing funds from the account without authorization. In fact, the victim did not withdraw any funds, **WILSON** simply took the money. The other teller was questioned and denied knowledge of any withdrawals. **WILSON** admitted that she had used the other teller's computer terminal to make the withdrawals from the same victim's account, while the other teller was away from her teller drawer. **WILSON** also stated that the other teller was not aware of her scheme and had not given **WILSON** authorization to make any of the withdrawals.

Records would be introduced to show that **WILSON** usually embezzled between \$500 or \$600 at a time. Records would show that between December 10, 2007 and October 17, 2008,

WILSON made approximately forty-seven (47) unauthorized withdrawals, totaling approximately \$22,060. Agents from the Federal Bureau of Investigation (FBI) would testify that **WILSON** admitted to the embezzlement scheme, and detailed how she carried out the scheme. FBI agents and employees of the bank would further testify that the Bank of New Orleans was insured by the Federal Deposit Insurance Corporation.

In summary, all of the evidence introduced at trial would establish the elements of the offense and prove the defendant's guilt beyond a reasonable doubt.

READ AND APPROVED:

GARY SCHWABE (Date)
Counsel for Shanquell Wilson

JON MAESTRI (Date)
Assistant U.S. Attorney

SHANQUELL WILSON (Date)
Defendant